



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 9, 2012

RE: PORTAGE COUNTY
KENT
INDUSTRIAL STORM WATER
SMITHERS-OASIS NORTH AMERICA
PERMIT NO: 3GR00045

Mr. Kevin Kilroy
Smithers-Oasis North America
919 Marvin Street
Kent, OH 44240

Dear Mr. Kilroy:

On June 25, 2012, this writer conducted an inspection of your facility, located at 919 Marvin Street, Kent, Ohio to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) permit for Industrial Activity #3GR00045*EG. As representatives of Smithers-Oasis North America, Chuck Miller, the facility's operations manager, and yourself were present during the inspection as well. Along with my observations from the inspection, I have provided comments concerning your permit below:

General

1. This site is the location of Smithers-Oasis North America, a company that manufactures foam material for the floral and horticulture industries as described by Standard Industrial Classification (SIC) Code 3086: Miscellaneous Plastic Products.
2. All the storm sewer drains on site flow to the city of Kent's municipal storm sewer system. The drains on the northeast corner of the property flow east, into a ditch, which empties into the Cuyahoga River. The rest of the drains on the property connect to the sewer system on Marvin Street, which empties into a ditch flowing west and into the Cuyahoga River.

Inspection Observations

1. Some oil stains from leaking trucks on the pavement outside the loading docks, close to outfall 3, are visible on the pavement. Implement good housekeeping practices to make sure the spills are cleaned up when immediately identified. Regularly inspect the area, looking for any leaks or spills and properly address those problems.
2. All of the various resin and chemicals stored outside are within secondary containment and covered under roofs. Spill kits are available inside Building 15, close by. The facility indicated that drip pans are used when loading resin or chemicals into the storage tanks. Some stains from loading resin into the resin building were present on the pavement. Please make sure that drip pans are always used when loading resin and chemicals into the storage tanks.
3. The storm drains that capture runoff from the dust hog area and the saw cutting dust cyclone area have been filtered with geotextile fabric. The fabric has ripped and is no longer filtering the drain. The filters must be replaced immediately. Implement routine inspections on these filters to make sure they are working properly.

Permit

1. As required in Part 5.4 of the NPDES permit, records of employee training and all facility inspection reports must be kept with your Storm Water Pollution Prevention Plan (SWP3).
2. The facility indicated that outfall 2 of the facility was the discharge of sheet flow from the shipping dock and the paved parking lot area. Guidance on how to collect sheet flow samples and grab samples can be found at the following Ohio EPA website: http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx

Action Items

- Clean up oil stains;
- Replace geotextile filters in aforementioned storm drains;
- Implement good housekeeping practices throughout the facility; and
- Make aforementioned improvements to SWPPP.

You are directed to provide me with a letter of response, no later than July 20, 2012, indicating the actions you will take to address the concerns and violations noted above.

If you should have any questions concerning this letter, feel free to contact me at (330) 963-1128 or by email robert.hrusovsky@epa.state.oh.us.

Sincerely,



Robert Hrusovsky
Assistant to the District Engineer
Division of Surface Water

RH/cs

Cc: Chuck Miller, Operations Manager, Smithers-Oasis North America
Gene Roberts, Service Director, City of Kent